

April 11, 2000

VIA HAND DELIVERY

Mary Cottrell
Secretary
Massachusetts Department
of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

*Re: Letter of Covad Communications Company in Lieu of Comments Upon
AT&T Motion to Modify Testing of Bell Atlantic's OSS; DTE 99-271*

Dear Secretary Cottrell:

On behalf of Covad Communications Company ("Covad"), please accept the original and two (2) copies of this letter in lieu of comments upon the motion of AT&T (filed March 24, 2000) to modify the testing of the operations support systems ("OSS") of Bell Atlantic – Massachusetts ("BA-MA").

Covad supports AT&T's recommendations to expand the testing to include LSOG 4 and to allow for a 90-day period following testing by KPMG in which CLECs may test BA-MA's OSS in a commercial environment.

AT&T's first recommendation is well-taken. Given BA-MA's decision to deploy LSOG 4 and the fact that CLECs, including Covad, will have to build OSS interfaces according to the specifications of that standard, it is important for KPMG's testing to cover LSOG 4. As AT&T appropriately notes, the previous objection to testing LSOG 4 – that doing so would delay the testing unduly – is no longer valid. BA-MA itself has chosen to delay OSS testing, such that now there would not be any delay associated with testing LSOG 4. The Department should modify the KPMG testing to include LSOG 4.

AT&T's second recommendation that CLECs have 90 days following KPMG testing to conduct their own testing is justified by the experience in New York, Covad's own experience in the Bell Atlantic region, and the precedent set by the Pennsylvania Commission. As Bell Atlantic – New York ("BA-NY") dramatically demonstrated, KPMG testing alone may be insufficient to ensure that the company's OSS is indeed fully operational and scalable to commercial volumes. Had the New York Commission allowed CLECs 90 days to conduct their own testing in a true commercial environment, CLECs would have discovered the flaws in BA-NY's OSS that led to the company being fined millions of dollars. Similarly, Covad, as well as other CLECs, experienced a GUI outage in mid-March throughout the Bell Atlantic region that likely would not have been

discovered in the context of a planned, limited-scale third-party OSS test. It is more likely that commercial testing, which is broader and less predictable than a planned third-party test, would have caught the cause of that particular outage (which was a breakdown in Bell Atlantic's escalation process). For these reasons, the Department should do as the Pennsylvania Commission has done and provide a 90 day period following KPMG testing for CLECs to make certain that BA-MA's OSS functions operate properly in a commercial environment.

Respectfully submitted,

Antony Richard Petrilla

Counsel for Covad Communications Company

cc: Susan Davis, Esq.
Service List of DTE 99-271 (via email)